



General Motors LLC
2525 E Abram St
Arlington, TX 76010

March 11, 2013

Texas Commission on Environmental Quality
Office of Permit Administrative Review
Air Permits Division (MC-161)
P.O. Box 13087
Austin, Texas 78711-3087

Re: Clean Air Act Minor Title V Permit Revision Application (FOP O1151)
General Motors Arlington Assembly Plant

On July 16, 2013, the General Motors Arlington Assembly Plant was issued a revision to NSR Permit 19156. The primary purpose the issued revision was to incorporate a paint technology change that switched the basecoat portion of the topcoat operation from solvent to a waterborne coating. As a result of the waterborne conversion project, the abatement configurations were changed and the REECO Sr. Regenerative Thermal Oxidizer was also permanently shut down.

As required in 30 TAC 122.217(a)(2), we are submitting an application for a Minor Title V Permit Revision to incorporate the permit revisions to NSR 19156. Since the GM Arlington Assembly facility recently renewed the Title V permit O1151 with Mr. Vasant Chaphekar, TCEQ Air Permit Division, GM requests Mr. Chaphekar also perform the Minor Title V Revision.

The application we are filing today contains the required TCEQ forms as well as the appropriate certifications. The following forms are included:

- TCEQ Form OP-1 Site Summary Information
- TCEQ Form OP-2 Application for Permit Revision/Renewal
- TCEQ Form OP-CRO1 Certification by Responsible Official
- TCEQ Form OP-Mon CAM Addition/Deletions
- TCEQ Form OP-SUMR Individual Unit Summary for Revisions
- TCEQ Form UA-15 Emission Point/Stationary Vent/Distillation Operation Vent/Process Vent Attributes

Please contact me at (817) 652-2453 if you have any questions or require additional information.

Sincerely,

Chris Boehle
Sr. Environmental Engineer
Arlington Assembly Plant



Form OP-CRO1
Certification by Responsible Official
Federal Operating Permit Program

All initial permit application, revision, renewal, and reopening submittals requiring certification must be addressed using this form. Updates to site operating permit (SOP) and temporary operating permit (TOP) applications, other than public notice verification materials, must be certified prior to authorization of public notice or start of public announcement. Updates to general operating permit (GOP) applications must be certified prior to receiving an authorization to operate under a GOP.

I. IDENTIFYING INFORMATION		
A. RN: RN102505963	B. CN: 603595646	C. Account No.: TA-0157-I
D. Permit No.: O1151	E. Project No.: NA	
F. Area Name: Arlington Assembly		
G. Company Name: General Motors		
II. CERTIFICATION TYPE <i>(Please mark the appropriate box)</i>		
A. <input checked="" type="checkbox"/> Responsible Official:	B. <input type="checkbox"/> Duly Authorized Representative:	
III. SUBMITTAL TYPE <i>(Place an "X" in the appropriate box) (Only one response can be accepted per form)</i>		
<input type="checkbox"/> SOP/TOP Initial Permit Application	<input type="checkbox"/> Update to Permit Application	
<input type="checkbox"/> GOP Initial Permit Application	<input checked="" type="checkbox"/> Permit Revision, Renewal, or Reopening	
<input type="checkbox"/> Other: _____		
IV. CERTIFICATION OF TRUTH		
<p>This certification does not extend to information which is designated by the TCEQ as information for reference only.</p> <p>I, <u>Paul D. Graham</u>, certify that I am the <u>RO</u> for this application <i>(Certifier Name printed or typed)</i> <i>(RO or DAR)</i></p> <p>and that, based on information and belief formed after reasonable inquiry, the statements and information dated during the time period in Section IV.A below, or on the specific date(s) in Section IV.B below, are true, accurate, and complete:</p> <p><i>Note: Enter EITHER a Time Period OR Specific Date(s) for each certification. This section must be completed. The certification is not valid without documentation date(s).</i></p> <p>A. Time Period: From _____ to _____ <i>Start Date*</i> <i>End Date*</i></p> <p>OR</p> <p>B. Specific Dates: <u>3/11/13</u> _____ <i>Date 1*</i> <i>Date 2*</i> <i>Date 3*</i> <i>Date 4*</i> <i>Date 5*</i> <i>Date 6*</i> <i>Date 7*</i> <i>Date 8*</i></p> <p><i>*The Time Period option may only be used when the "Submittal Type" is 'Update to Permit Application' and there are multiple uncertified submittals; or a submittal package has multiple dates recorded in the documentation. Do not use the Time Period option if the "Submittal Type" is 'Other.'</i></p>		
Signature: <u>Paul Graham</u>		Signature Date: <u>3/11/13</u>
Title: <u>Plant Manager</u>		



**Texas Commission on Environmental Quality
Federal Operating Permit Program
Site Information Summary
Form OP-1 (Page 1)**

Please print or type all information. Direct any questions regarding this application form to the Air Permits Division at (512) 239-1250. Address written inquiries to the Texas Commission on Environmental Quality, Office of Permitting and Registration, Air Permits Division (MC 163), P.O. Box 13087, Austin, Texas 78711-3087.

I. COMPANY IDENTIFYING INFORMATION													
A. Company Name:		General Motors LLC											
B. Customer Reference Number (CN):		CN603595646											
C. Submittal Date (mm/dd/yyyy):		03/11/2013											
II. SITE INFORMATION													
A. Site Name:		General Motors Arlington Assembly Plant											
B. Regulated Entity Reference Number (RN):		RN102505963											
C. Primary Account Number for Site:		TA-0157-I											
D. Indicate affected state(s) required to review permit application: <i>(Place an "X" in the appropriate box[es].)</i>													
AR		CO		KS		LA		NM		OK		N/A	X
E. Indicate all pollutants for which the site is a major source based on the site's potential to emit:													
Pollutant		VOC	NO _x	SO ₂	PM ₁₀	CO	Pb	HAPS	Other				
Major at the Site (YES/NO):		X	X		X			X					
F. Is the source a non-major source subject to the Federal Operating Permit Program?											<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		
G. Is the site within a local program area jurisdiction?											<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO		
H. Will emissions averaging be used to comply with any Subpart of 40 CFR Part 63?											<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		
I. Indicate the 40 CFR Part 63 Subpart(s) that will use emissions averaging:													
III. PERMIT TYPE													
A. Type of Permit Requested: <i>(Select only one response and place an "X" in the box.)</i>													
Site Operating Permit (SOP)		X	Temporary Operating Permit (TOP)			General Operating Permit (GOP)							
IV. INITIAL APPLICATION INFORMATION <i>(Complete for Initial Issuance Applications only.)</i>													
A. Is this submittal an abbreviated or a full application?											<input type="checkbox"/> Abbreviated <input checked="" type="checkbox"/> Full		
B. If this is a full application, is the submittal a follow-up to an abbreviated application?											<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		
C. If this is an abbreviated application, is this an early submittal for a combined SOP and Acid Rain/CAIR permit?											<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		
D. Has a copy of this application been submitted (or is being submitted) to EPA? (Refer to the form instructions for additional information.)											<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO		



**Texas Commission on Environmental Quality
Federal Operating Permit Program
Site Information Summary
Form OP-1 (Page 2)**

V. CONFIDENTIAL INFORMATION			
A. Is confidential information submitted in conjunction with this application?			<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
VI. RESPONSIBLE OFFICIAL (RO)			
A. RO Name: (<input checked="" type="checkbox"/> Mr. <input type="checkbox"/> Mrs. <input type="checkbox"/> Ms. <input type="checkbox"/> Dr.) Paul D. Graham			
B. RO Title: Plant Manager			
C. Employer Name: General Motors			
D. Mailing Address: 2525 East Abram Street			
City: Arlington		State: TX	ZIP Code: 76010
Territory:		Country:	Foreign Postal Code:
E. Internal Mail Code:		F. Telephone: 817-652-2222	
G. Fax:		H. E-mail: paul.d.graham@gm.com	
VII. TECHNICAL CONTACT IDENTIFYING INFORMATION <i>(Complete if different from RO.)</i>			
A. Technical Contact Name: (<input checked="" type="checkbox"/> Mr. <input type="checkbox"/> Mrs. <input type="checkbox"/> Ms. <input type="checkbox"/> Dr.) Chris Boehle			
B. Technical Contact Title: Sr. Environmental Engineer			
C. Employer Name: General Motors			
D. Mailing Address: 2525 East Abram Street			
City: Arlington		State: TX	ZIP Code: 76010
Territory:		Country:	Foreign Postal Code:
E. Internal Mail Code:		F. Delivery Address: SAME	
City:		State:	ZIP Code:
Territory:		Country:	Foreign Postal Code:
G. Internal Mail Code:		H. Telephone: 817-652-2453	
I. Fax: 817-652-2336		J. E-mail: chris.boehle@gm.com	
VIII. REFERENCE ONLY REQUIREMENTS <i>(For reference only.)</i>			
A. State Senator: Wendy Davis			
B. State Representative: Diane Patrick			
C. Has the applicant paid emissions fees for the most recent agency fiscal year (Sept. 1 - August 31)?			<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
D. Is the site subject to bilingual notice requirements pursuant to 30 TAC § 122.322?			<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
E. Indicate the alternate language(s) in which public notice is required:			Spanish



Texas Commission on Environmental Quality
Federal Operating Permit Program
Site Information Summary
Form OP-1 (Page 3)

IX. OFF-SITE PERMIT REQUEST (Optional for applicants requesting to hold the FOP and records at an off-site location.)		
A. Office/Facility Name:		
B. Physical Address:		
City:	State:	ZIP Code:
Territory:	Country:	Foreign Postal Code:
C. Physical Location:		
D. Contact Name: (<input type="checkbox"/> Mr. <input type="checkbox"/> Mrs. <input type="checkbox"/> Ms. <input type="checkbox"/> Dr.)		
E. Telephone:		
X. APPLICATION AREA INFORMATION		
A. Area Name: General Motors Arlington Assembly Plant		
B. Physical Address: 2525 East Abram Street		
City: Arlington	State: TX	ZIP Code: 76010
C. Physical Location:		
D. Nearest City: Arlington		
E. State: Texas	F. ZIP Code: 76010	
G. Latitude (nearest second): 32 44' 56"	H. Longitude (nearest second): 097 04' 19"	
I. Are there any emission units that were not in compliance with the applicable requirements identified in the application at the time of application submittal?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	
J. Indicate the estimated number of emission units in the application area:	10	
K. Are there any emission units in the application area subject to the Acid Rain Program and/or CAIR?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	
XI. PUBLIC NOTICE (Complete this section for SOP Applications and Acid Rain Permit Applications only.)		
A. Name of public place to view application and draft permit: TCEQ Dallas/Ft. Worth Regional Office		
B. Physical Address: 2309 Gravel Drive		
City: Fort Worth	ZIP Code: 76118	
C. Contact Person (Someone who will answer questions from the public, during the public notice period):		
(<input checked="" type="checkbox"/> Mr. <input type="checkbox"/> Mrs. <input type="checkbox"/> Ms. <input type="checkbox"/> Dr.) Chris Boehle		
D. Contact Mailing Address:		
City: Arlington	State: TX	ZIP Code: 76010
Territory:	Country:	Foreign Postal Code:
E. Internal Mail Code:	F. Telephone: (817) 652-2453	
XII. DELINQUENT FEES AND PENALTIES		
Notice: This form will not be processed until all delinquent fees and/or penalties owed to the TCEQ or the Office of Attorney General on behalf of the TCEQ are paid in accordance with the "Delinquent Fee and Penalty Protocol."		



Texas Commission on Environmental Quality
Federal Operating Permit Program
Site Information Summary
Form OP-1 (Page 4)

Complete Sections XIII and XIV for Acid Rain Permit and CAIR Permit applications only. Please include a copy of the Certificate of Representation submitted to EPA.

XIII. DESIGNATED REPRESENTATIVE (DR) IDENTIFYING INFORMATION

A. DR Name: (<input type="checkbox"/> Mr. <input type="checkbox"/> Mrs. <input type="checkbox"/> Ms. <input type="checkbox"/> Dr.)		
B. DR Title:		
C. Employer Name:		
D. Mailing Address:		
City:	State:	ZIP Code:
Territory:	Country:	Foreign Postal Code:
E. Internal Mail Code:		F. Telephone:
G. Fax:		H. E-mail:

XIV. ALTERNATE DESIGNATED REPRESENTATIVE (ADR) IDENTIFYING INFORMATION

A. ADR Name: (<input type="checkbox"/> Mr. <input type="checkbox"/> Mrs. <input type="checkbox"/> Ms. <input type="checkbox"/> Dr.)		
B. ADR Title:		
C. Employer Name:		
D. Mailing Address:		
City:	State:	ZIP Code:
Territory:	Country:	Foreign Postal Code:
E. Internal Mail Code:		F. Telephone:
G. Fax:		H. E-mail:



Texas Commission on Environmental Quality
Federal Operating Permit Program
Application for Permit Revision/Renewal
Form OP-2
Table 1

Date: 3/11/13	Permit No.: O1151	Account No.: TA-0151-I	Regulated Entity No.: RN102505963
Area Name: Arlington Assembly Plant		Company Name: General Motors	Customer Reference No.: CN603595646

For Submissions to EPA (SOP renewal, minor revision, and significant revision applications only)

Has a copy of this application been submitted (or is being submitted) to EPA? (Refer to the form instructions for additional information.)

☒ YES ☐ NO

I. APPLICATION TYPE

Indicate the type of application:

<input type="checkbox"/> Renewal	<input checked="" type="checkbox"/> Streamlined Revision (Must include provisional terms and conditions as explained in the instructions.)
<input type="checkbox"/> Significant Revision	<input type="checkbox"/> Revision Requesting Prior Approval
<input type="checkbox"/> Administrative Revision	<input type="checkbox"/> Response to Reopening

II. QUALIFICATION STATEMENT

For SOP Revisions Only	The referenced changes qualify for the marked revision type.	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
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For GOP Revisions Only	The permitted area continues to qualify for a GOP.	<input type="checkbox"/> YES <input type="checkbox"/> NO
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III. MAJOR SOURCE POLLUTANTS (Complete this section if the permit revision is due to a change at the site.)

Indicate all pollutants for which the site is a major source based on the site's potential to emit after the change is operated:

Pollutant	VOC	NO _x	SO ₂	PM ₁₀	CO	Pb	HAPs	Other
Major at the Site (YES/NO):	X	X		X			X	

IV. FEE INFORMATION

Has the applicant paid emissions fees for the most recent agency fiscal year (September 1 - August 31)?	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
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V. DELINQUENT FEES AND PENALTIES

Notice: This form will not be processed until all delinquent fees and/or penalties owed the TCEQ or the Office of the Attorney General on behalf of the TCEQ are paid in accordance with the Delinquent Fee and penalty protocol.



Texas Commission on Environmental Quality
Federal Operating Permit Program
Application for Permit Revision/Renewal
Form OP-2
Table 2

Date: 3/11/13	Permit No.: O1151	Account No.: TA-0157-I	Regulated Entity No.: RN102505963
Area Name: Arlington Assembly Plant	Company Name: General Motors	Customer Reference No.: CN603595646	

I. DESCRIPTION OF REVISION						
Revision No.	Revision Code	Unit/Group Process			NSR Authorization	Description of Changes and Provisional Terms and Conditions
		New Unit	ID No.	Applicable Form		
NA	MS-A	No			19156 (5E)	The BC/CC daily limit changed to 5.2 lbs VOC/gallon due to switching Paint Technology from solvent to waterborne
NA	MS-A	No			19156 (9C Table)	Added Heated Flash Emission unit to Row 1, Cell 1 and Row 3, Row 1. Heated Flash is needed to remove the water in the Basecoat prior to entering the Clearcoat booth.
NA	MS-A	No			19156 (11 Table)	Basecoat and Clearcoat Robots were modified and are now Electrostatic Bells.
NA	MS-A	No			19156 (12 Table)	Coating booth filter requirements were added.
NA	MS-A	No			19156 (13)	Filter and waterwash requirements were added
NA	MS-A	No			19156 (14 Table)	The abatement configuration changed due to the waterborne conversion and the elimination of REECO Sr. The Durr Organic Compound Control Efficiency was raised to 87%
NA	MS-A	No			19156 (14A-J)	RTO Continuous monitoring of the combustion chamber requires a 3-hour average consistent with CAM & NSPS. Numerous new abatement monitoring requirements added.
NA	MS-A	No			19156 (16)	Paint shop sealers, primer surfacer and Basecoat/Clearcoat reduced to 85 jph
NA	MS-A	No			19156	Removed usage restrictions, since facility is regulated by

						MAERT Table
NA	MS-A	No			19156 (17)	Updated Chemical Usage Limitations to current TCEQ requirements
NA	MS-A	No			19156 (19)	New stack testing requirements due to abatement changes and waterborne technology implementation.
NA	MS-A	No			19156 (12 D,F,H,I,J,K,M)	Recordkeeping requirements added
NA	MS-A	No			19156 (MAERT Table)	MAERT Table Changes to Primer Surfacer system due to booth abated by DURR RTO/Concentrator, Topcoat System revised to replace solventborne abated emissions to waterborne emissions and abated heated flash. New observation zones added, Clearcoat booth now goes to DURR RTO/Concentrator. Sealer automation cell added to plant wide sealers, adhesives & reduction in natural gas usage due to shutting down REECO Sr.



Texas Commission on Environmental Quality
Federal Operating Permit Program
Application for Permit Revision/Renewal
Form OP-2
Table 3

Date:	Permit No.:	Account No.:	Regulated Entity No.:
Area Name:	Company Name:		Customer Reference No.:

I. SIGNIFICANT REVISION <i>(Complete this section if you are submitting a significant revision application or a renewal application that includes a significant revision.)</i>			
A. Is the site subject to bilingual requirements pursuant to 30 TAC § 122.322?	<input type="checkbox"/> YES <input type="checkbox"/> NO		
B. Indicate the alternate language(s) in which public notice is required:			
C. Will there be a change in air pollutant emissions as a result of the significant revision?	<input type="checkbox"/> YES <input type="checkbox"/> NO		



**Monitoring Requirements
Form OP-MON (Page 1)
Federal Operating Permit Program**

Table 1a: CAM/PM Additions

I. IDENTIFYING INFORMATION		
A. Account No.: TA-0157-I	B. RN No.: RN102505963	C. CN No.: CN603595646
D. Permit No.: O1151	E. Project No.: 16767	F. Area Name: Arlington Assembly Plant
G. Company Name: General Motors LLC		
II. UNIT/EMISSION POINT/GROUP/PROCESS INFORMATION		
A. Revision No.: ROP Rev 1	B. Unit/EPN/Group/Process ID No.: PROTOPCOAT	C. Applicable Form:
III. APPLICABLE REGULATORY REQUIREMENT		
A. Name: Subchapter G 122.604 & 40 CFR Part 64		B. SOP/GOP Index No.:
C. Pollutant: VOC	D. Main Standard: 30 TAC Chapter 122.604	
IV. TITLE V MONITORING INFORMATION		
A. Monitoring Type: CAM	B. Unit Size: LG	C. CAM/PM Option No.:
D. Deviation Limit: Clearcoat Thermal Oxidizer Minimum operating temperature 1350 degrees F maintained at a 3-hour average temperature over four equally spaced measurement points per hour established during testing that achieves the required DE. Monitor Rotary Concentrator temp continuously.		
E. CAM/PM Option No.:		
F. Deviation Limit:		
V. CONTROL DEVICE INFORMATION		
A. Device ID No.: Durr RTO		B. Device Type: DIRFLM

Table 1b: CAM/PM Control Device Additions

EMISSION UNIT			CONTROL DEVICE			
1	A. Unit ID No.:		B. Device ID No.:		C. Device Type:	
	A. Unit ID No.:	DURR Carbon	B. Device ID No.:	DURR Carbon	C. Device Type:	CRBAD1
2	A. Unit ID No.:	DURR RTO	B. Device ID No.:	DURR RTO	C. Device Type:	DIRFLM
3	A. Unit ID No.:	REECO JR OVEN	B. Device ID No.:	REECO JR	C. Device Type:	DIRFLM
4	A. Unit ID No.:	REECO JR HF	B. Device ID No.:	REECO JR	C. Device Type:	DIRFLM
5	A. Unit ID No.:		B. Device ID No.:		C. Device Type:	
6	A. Unit ID No.:		B. Device ID No.:		C. Device Type:	
7	A. Unit ID No.:		B. Device ID No.:		C. Device Type:	
8	A. Unit ID No.:		B. Device ID No.:		C. Device Type:	
9	A. Unit ID No.:		B. Device ID No.:		C. Device Type:	
10	A. Unit ID No.:		B. Device ID No.:		C. Device Type:	



**Monitoring Requirements
Form OP-MON (Page 2)
Federal Operating Permit Program**

Table 1c: CAM/PM Case-By-Case Additions

I. IDENTIFYING INFORMATION		
A. Account No.:	B. RN No.:	C. CN No.:
D. Permit No.:	E. Project No.:	F. Area Name:
G. Company Name:		
II. UNIT/EMISSION POINT/GROUP/PROCESS INFORMATION		
A. Revision No.:	B. Unit/EPN/Group/Process ID No.:	C. Applicable Form:
III. APPLICABLE REGULATORY REQUIREMENT		
A. Name:		B. SOP Index No.:
C. Pollutant:	D. Main Standard:	
E. Monitoring Type:		F. Unit Size:
G. Deviation Limit:		
IV. CONTROL DEVICE INFORMATION		
A. Device ID No.:		B. Device Type:
V. CAM CASE-BY-CASE		
A. Indicator:	B. Minimum Frequency:	C. Averaging Period:
D. QA/QC Procedures:		
E. Verification Procedures:		
F. Representative Data:		
VI. PERIODIC MONITORING CASE-BY-CASE		
A. Indicator:	B. Minimum Frequency:	C. Averaging Period:
D. Periodic Monitoring Text:		

Table 1d: CAM/PM Case-by-Case Control Device Additions

EMISSION UNIT			CONTROL DEVICE			
1	A. Unit ID No.:		B. Device ID No.:		C. Device Type:	
2	A. Unit ID No.:		B. Device ID No.:		C. Device Type:	
3	A. Unit ID No.:		B. Device ID No.:		C. Device Type:	
4	A. Unit ID No.:		B. Device ID No.:		C. Device Type:	
5	A. Unit ID No.:		B. Device ID No.:		C. Device Type:	
6	A. Unit ID No.:		B. Device ID No.:		C. Device Type:	
7	A. Unit ID No.:		B. Device ID No.:		C. Device Type:	



**Monitoring Requirements
Form OP-MON (Page 3)
Federal Operating Permit Program**

Table 2a: CAM/PM Deletions

I. IDENTIFYING INFORMATION			
A. Account No.:	TA-0157-i	B. RN No.:	RN102505963
C. CN No.:	603595646		
D. Permit No.:	O1151	E. Project No.:	F. Area Name: Arlington Assembly Plant
G. Company Name:	General Motors LLC		
II. UNIT/EMISSION POINT/GROUP/PROCESS INFORMATION			
A. Revision No.:	B. Unit/EPN/Group/Process ID No.:	PROTOPCOAT	
C. Applicable Form:			
III. APPLICABLE REGULATORY REQUIREMENT			
A. Name: 30 TAC Chapter 115, Surface Coating Operations		B. SOP/GOP Index No.:	
C. Pollutant: VOC	D. Main Standard: 115.423(3)(A)		
IV. TITLE V MONITORING INFORMATION			
A. Monitoring Type: CAM		B. CAM/PM Option No.:	
V. CONTROL DEVICE INFORMATION			
A. Device ID No.:		B. Device Type: DIRFLM	
VI. TYPE OF DELETION			
A. Monitoring Requirement:		B. Control Device:	

Table 2b: CAM/PM Control Device Deletions

EMISSION UNIT			CONTROL DEVICE			
1	A. Unit ID No.:	DURR RTO	B. Device ID No.:	DURR RTO	C. Device Type:	DIRFLM
2	A. Unit ID No.:	DURR Carbon	B. Device ID No.:	Durr Carbon	C. Device Type:	CRBAD1
3	A. Unit ID No.:		B. Device ID No.:		C. Device Type:	
4	A. Unit ID No.:		B. Device ID No.:		C. Device Type:	
5	A. Unit ID No.:		B. Device ID No.:		C. Device Type:	
6	A. Unit ID No.:		B. Device ID No.:		C. Device Type:	
7	A. Unit ID No.:		B. Device ID No.:		C. Device Type:	
8	A. Unit ID No.:		B. Device ID No.:		C. Device Type:	
9	A. Unit ID No.:		B. Device ID No.:		C. Device Type:	
10	A. Unit ID No.:		B. Device ID No.:		C. Device Type:	



**Monitoring Requirements
Form OP-MON (Page 4)
Federal Operating Permit Program**

Table 2c: CAM/PM Case-By-Case Deletions

I. IDENTIFYING INFORMATION		
A. Account No.:	B. RN No.:	C. CN No.:
D. Permit No.:	E. Project No.:	F. Area Name:
G. Company Name:		
II. UNIT/EMISSION POINT/GROUP/PROCESS INFORMATION		
A. Revision No.:	B. Unit/EPN/Group/Process ID No.:	C. Applicable Form:
III. APPLICABLE REGULATORY REQUIREMENT		
A. Name:	B. SOP Index No.:	
C. Pollutant:	D. Main Standard:	
IV. TITLE V MONITORING INFORMATION		
A. Monitoring Type:		
V. CONTROL DEVICE INFORMATION		
A. Device ID No.:	B. Device Type:	
VI. TYPE OF DELETION		
A. Monitoring Requirement:	B. Control Device:	

Table 2d: CAM/PM Case-by-Case Control Device Deletions

EMISSION UNIT			CONTROL DEVICE			
1	A. Unit ID No.:		B. Device ID No.:		C. Device Type:	
2	A. Unit ID No.:		B. Device ID No.:		C. Device Type:	
3	A. Unit ID No.:		B. Device ID No.:		C. Device Type:	
4	A. Unit ID No.:		B. Device ID No.:		C. Device Type:	
5	A. Unit ID No.:		B. Device ID No.:		C. Device Type:	
6	A. Unit ID No.:		B. Device ID No.:		C. Device Type:	
7	A. Unit ID No.:		B. Device ID No.:		C. Device Type:	
8	A. Unit ID No.:		B. Device ID No.:		C. Device Type:	
9	A. Unit ID No.:		B. Device ID No.:		C. Device Type:	
10	A. Unit ID No.:		B. Device ID No.:		C. Device Type:	



**Monitoring Requirements
Form OP-MON (Page 1)
Federal Operating Permit Program**

Table 1a: CAM/PM Additions

I. IDENTIFYING INFORMATION		
A. Account No.: TA-0157-I	B. RN No.: RN102505963	C. CN No.: CN603595646
D. Permit No.: O1151	E. Project No.: 16767	F. Area Name: Arlington Assembly Plant
G. Company Name: General Motors LLC		
II. UNIT/EMISSION POINT/GROUP/PROCESS INFORMATION		
A. Revision No.: ROP Rev 1	B. Unit/EPN/Group/Process ID No.: PROPSURF	C. Applicable Form:
III. APPLICABLE REGULATORY REQUIREMENT		
A. Name: Subchapter G 122.604 & 40 CFR Part 64		B. SOP/GOP Index No.:
C. Pollutant: VOC	D. Main Standard: 30 TAC Chapter 122.604	
IV. TITLE V MONITORING INFORMATION		
A. Monitoring Type: CAM	B. Unit Size: LG	C. CAM/PM Option No.:
D. Deviation Limit: Primer Surfacers Booth Thermal Oxidizer Minimum operating temperature 1350 degrees F maintained at a 3-hour average temperature over four equally spaced measurement points per hour established during testing that achieves the required DE. Monitor Rotary Concentrator temp continuously		
E. CAM/PM Option No.:		
F. Deviation Limit:		
V. CONTROL DEVICE INFORMATION		
A. Device ID No.: Durr RTO		B. Device Type: DIRFLM

Table 1b: CAM/PM Control Device Additions

EMISSION UNIT			CONTROL DEVICE		
1	A. Unit ID No.:	DURR Carbon	B. Device ID No.:	DURR Carbon	C. Device Type: CRBAD1
2	A. Unit ID No.:	DURR RTO	B. Device ID No.:	DURR RTO	C. Device Type: DIRFLM
3	A. Unit ID No.:	REECO JR -OVEN	B. Device ID No.:	REECO JR	C. Device Type: DIRFLM
4	A. Unit ID No.:		B. Device ID No.:		C. Device Type:
5	A. Unit ID No.:		B. Device ID No.:		C. Device Type:
6	A. Unit ID No.:		B. Device ID No.:		C. Device Type:
7	A. Unit ID No.:		B. Device ID No.:		C. Device Type:
8	A. Unit ID No.:		B. Device ID No.:		C. Device Type:
9	A. Unit ID No.:		B. Device ID No.:		C. Device Type:
10	A. Unit ID No.:		B. Device ID No.:		C. Device Type:

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Form OP-MON - This form for use by facilities subject to air quality permit requirements and may be revised periodically [APDG 5234v3]

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Table 1c: CAM/PM Case-By-Case Additions

I. IDENTIFYING INFORMATION		
A. Account No.:	B. RN No.:	C. CN No.:
D. Permit No.:	E. Project No.:	F. Area Name:
G. Company Name:		
II. UNIT/EMISSION POINT/GROUP/PROCESS INFORMATION		
A. Revision No.:	B. Unit/EPN/Group/Process ID No.:	C. Applicable Form:
III. APPLICABLE REGULATORY REQUIREMENT		
A. Name:		B. SOP Index No.:
C. Pollutant:	D. Main Standard:	
E. Monitoring Type:		F. Unit Size:
G. Deviation Limit:		
IV. CONTROL DEVICE INFORMATION		
A. Device ID No.:		B. Device Type:
V. CAM CASE-BY-CASE		
A. Indicator:	B. Minimum Frequency:	C. Averaging Period:
D. QA/QC Procedures:		
E. Verification Procedures:		
F. Representative Data:		
VI. PERIODIC MONITORING CASE-BY-CASE		
A. Indicator:	B. Minimum Frequency:	C. Averaging Period:
D. Periodic Monitoring Text:		

Table 1d: CAM/PM Case-by-Case Control Device Additions

EMISSION UNIT			CONTROL DEVICE			
1	A. Unit ID No.:		B. Device ID No.:		C. Device Type:	
2	A. Unit ID No.:		B. Device ID No.:		C. Device Type:	
3	A. Unit ID No.:		B. Device ID No.:		C. Device Type:	
4	A. Unit ID No.:		B. Device ID No.:		C. Device Type:	
5	A. Unit ID No.:		B. Device ID No.:		C. Device Type:	
6	A. Unit ID No.:		B. Device ID No.:		C. Device Type:	
7	A. Unit ID No.:		B. Device ID No.:		C. Device Type:	

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**Monitoring Requirements
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Table 2a: CAM/PM Deletions

I. IDENTIFYING INFORMATION					
A. Account No.: TA-0157-I		B. RN No.: RN102505963		C. CN No.: CN603595646	
D. Permit No.: O1151		E. Project No.:		F. Area Name: Arlington Assembly Plant	
G. Company Name: General Motors LLC					
II. UNIT/EMISSION POINT/GROUP/PROCESS INFORMATION					
A. Revision No.:		B. Unit/EPN/Group/Process ID No.: PROPSURF		C. Applicable Form:	
III. APPLICABLE REGULATORY REQUIREMENT					
A. Name: 30 TAC Chapter 115, Surface Coating Operations				B. SOP/GOP Index No.: R5421-8-2	
C. Pollutant: VOC				D. Main Standard: 115.423(3)(A)	
IV. TITLE V MONITORING INFORMATION					
A. Monitoring Type: CAM				B. CAM/PM Option No.:	
V. CONTROL DEVICE INFORMATION					
A. Device ID No.: DURR				B. Device Type: DIRFLM	
VI. TYPE OF DELETION					
A. Monitoring Requirement: X				B. Control Device: X	

Table 2b: CAM/PM Control Device Deletions

EMISSION UNIT			CONTROL DEVICE			
1	A. Unit ID No.:	DURR Carbon	B. Device ID No.:	DURR Carbon	C. Device Type:	CRBAD1
2	A. Unit ID No.:	DURR RTO	B. Device ID No.:	DURR RTO	C. Device Type:	
3	A. Unit ID No.:		B. Device ID No.:		C. Device Type:	
4	A. Unit ID No.:		B. Device ID No.:		C. Device Type:	
5	A. Unit ID No.:		B. Device ID No.:		C. Device Type:	
6	A. Unit ID No.:		B. Device ID No.:		C. Device Type:	
7	A. Unit ID No.:		B. Device ID No.:		C. Device Type:	
8	A. Unit ID No.:		B. Device ID No.:		C. Device Type:	
9	A. Unit ID No.:		B. Device ID No.:		C. Device Type:	
10	A. Unit ID No.:		B. Device ID No.:		C. Device Type:	



**Monitoring Requirements
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Federal Operating Permit Program**

Table 2c: CAM/PM Case-By-Case Deletions

I. IDENTIFYING INFORMATION		
A. Account No.:	B. RN No.:	C. CN No.:
D. Permit No.:	E. Project No.:	F. Area Name:
G. Company Name:		
II. UNIT/EMISSION POINT/GROUP/PROCESS INFORMATION		
A. Revision No.:	B. Unit/EPN/Group/Process ID No.:	C. Applicable Form:
III. APPLICABLE REGULATORY REQUIREMENT		
A. Name:	B. SOP Index No.:	
C. Pollutant:	D. Main Standard:	
IV. TITLE V MONITORING INFORMATION		
A. Monitoring Type:		
V. CONTROL DEVICE INFORMATION		
A. Device ID No.:	B. Device Type:	
VI. TYPE OF DELETION		
A. Monitoring Requirement:	B. Control Device:	

Table 2d: CAM/PM Case-by-Case Control Device Deletions

EMISSION UNIT			CONTROL DEVICE			
1	A. Unit ID No.:		B. Device ID No.:		C. Device Type:	
2	A. Unit ID No.:		B. Device ID No.:		C. Device Type:	
3	A. Unit ID No.:		B. Device ID No.:		C. Device Type:	
4	A. Unit ID No.:		B. Device ID No.:		C. Device Type:	
5	A. Unit ID No.:		B. Device ID No.:		C. Device Type:	
6	A. Unit ID No.:		B. Device ID No.:		C. Device Type:	
7	A. Unit ID No.:		B. Device ID No.:		C. Device Type:	
8	A. Unit ID No.:		B. Device ID No.:		C. Device Type:	
9	A. Unit ID No.:		B. Device ID No.:		C. Device Type:	
10	A. Unit ID No.:		B. Device ID No.:		C. Device Type:	

APPENDIX 1 To Form OP-MON

I. Evaluation of CAM Plan Requirements for the Arlington Assembly Plant

Compliance Assurance Monitoring (CAM) under 40 CFR Part 64 for major stationary sources applies to pollutant-specific emissions units at a major source that is required to obtain a part 70 or 71 permit if the unit satisfies all of the following criteria: 1.) The unit is subject to an emission limitation or standard for the applicable regulated air pollutant other than an emission limitation or standard that is exempt under 40 CFR part 64, section 64.2 (b)(1), 2.) The unit uses a control device to achieve compliance with any such emission limitation or standard; and 3.) The unit has potential pre-control device emissions of the applicable regulated air pollutant that are equal to or greater than 100 percent of the amount, in tons per year, required for a source to be classified as a major source.

To provide reasonable assurance of compliance with emission limitations or standards for the anticipated range of operations at a pollutant-specific emissions unit, monitoring shall meet the following general criteria: 1.) The owner or operator shall design the monitoring to obtain data for one or more indicators of emission control performance, 2.) The owner or operator shall establish appropriate range(s) or designated conditions(s) for the selected indicators such that operation within the range provides reasonable assurance of ongoing compliance with emission limitations or standards over the anticipated range of operating conditions, and 3.) The design of indicator ranges or designated conditions may be based on a single maximum or minimum value, may be expressed as a function of process variables, may be expressed as a particular operational status or condition, or may be interdependent between more than one indicators.

The monitoring plan shall include a justification for the proposed elements of the monitoring plan and, if different from the manufacturer recommendations, an explanation of the reasons for the differences shall be discussed. If the monitoring plan relies on presumptively acceptable monitoring, no further justification for the appropriateness of that monitoring should be necessary.

For the Arlington Assembly facility, there are two emission units that have potential volatile organic compounds (VOC's) emissions greater than the major source level prior to control and thus are subject to CAM under 40 CFR part 64. These emission points are PROPSURF and PROTOPCOAT. Elements of the CAM plan are currently included in the site's Part 70 Operating Permit, Permit No. 01151

II. CAM Plan for Emission Units PROPSURF and PROTOPCOAT

A. Emission Unit Descriptions:

1. PROPSURF – The application and curing of the primer surfacer coating. The VOC is exhausted through two thermal oxidizers at Emission Points EPN 530 (automatic application zones) and EPN 321 (oven). The performance of the control devices is a function of the oxidizer temperature.
2. PROTOPCOAT – The application and curing of the Topcoat (Basecoat/Clearcoat) coatings. The VOC from the Basecoat Heated Flash is exhausted through Emission Points EPN 321 . The VOC from the Clearcoat Booth is exhausted through Emission Point EPN 530. Emissions from the Topcoat Oven (Basecoat & Clearcoat) is exhausted through EPN 321.

B. Applicable Requirements for CAM

Emission Unit	Permit Citation	Requirement
PROPSURF	30 TAC 116 NSR Permit 19156 MAERT	Emission Rate Limit 34.80 pounds per hour and 64.76 tons per year
PROTOPCOAT	30 TAC 116 NSR Permit 19156 MAERT	Emission Rate Limit 264.00 pounds per hour and 411.08 tons per year
	NSR Permit 19156 Condition 5.E.	The BC/CC VOC content is further limited on a daily basis to 5.2 lbs VOC/gal solids applied

C. Pollutant Subject to CAM for this Emission Point: VOC

D. Background

The EPA/Auto Protocol (EPA 450/3-88-018) specifies procedures for testing the destruction efficiency performance of oxidizers. Testing results using the Protocol's procedures demonstrate that the oxidizer operating temperature is an appropriate parameter to use as an indicator of VOC efficiency performance of oxidizers. A specified minimum temperature, therefore, can be used to initiate a process review and any necessary follow-up action.

The plant's VOC emissions performance is a function of several factors used to determine compliance. Thus, a change in operation of the oxidizer does not, by itself, indicate non-compliance with VOC emission limits.

From the performance tests, a credit is established for the VOC emissions reduction from the oxidizer. This oxidizer VOC emissions credit is one element in the equation (e.g., combined with other coating system control elements, such as paint application transfer efficiency, low VOC paint) used to determine the plant's VOC emissions performance. Thus, an apparent drop in oxidizer operating temperature below a specified level does not, by itself, indicate non-compliance with the VOC emission limits. A significant temperature drop, however, is an indication of a change in operation of the oxidizer that may have an adverse impact on performance of the control device.

Permit 19156 Condition 14 requires that all oxidizers operate at a minimum temperature of 1350 degrees F. Specifying an indicator temperature level for the oxidizer is also supported in the existing Standards of Performance for Automobile and Light Duty Truck Surface Coating Operations (NSPS) in 40 CFR Part 60, Subpart MM. Additionally, each oxidizer also has an Organic Compound Control Efficiency. Emission point 530 (Durr RTO/Concentrator) requires an overall efficiency of 87% and Reeco Jr. RTO requires a Destruction Efficiency of 95%.

E. Monitoring Approach

The following permit conditions from the existing NSR permit contain the elements of the CAM plan for this emissions unit

CAM Plan Elements to be Included in the Part 70 Operating Permit		
Emission Unit PROPSURF and PROTOPCOAT	Permit 19156 Condition 14 A.	A. Each RTO shall be equipped with a monitor that continuously monitors the combustion chamber temperature in the RTO combustion chamber (or in the duct immediately downstream of the combustion chamber before any substantial heat exchange occurs) and shall be accurate to within ± 2.5 degrees Celsius or $\pm 0.75\%$ of the temperature being measured. The temperature data recording shall consist of measurements made at equally spaced intervals, not to exceed 15 minutes per interval. The temperature shall be maintained at a 3-hour average temperature over four equally spaced measurement points per hour established during testing that achieves the required destruction efficiency. When averaging, an arithmetic or integrated average of all data may be used. The monitor shall be calibrated at least semiannually or in accordance with the manufacturer's specifications, whichever is greater.
Emission Unit PROPSURF and PROTOPCOAT	Permit 19156 Condition 14 B.	The rotary concentrator shall be equipped with a monitor that continuously measures the gas temperature in the desorption stream.

1. Indicator Range and Data Collection (Satisfies Section 64.4(a)(1)-(2))

a. Indicator Range – Investigation and corrective action will be triggered if the minimum temperature is less than 1350 degrees F for a 3-hour average temperature over four equally spaced measurement points per hour

b. Data Collection – In terms of temperature, thermocouples are used to continuously monitor the oxidizer combustion temperature. This temperature monitoring requirement is specifically addressed in the facility's Part 70 Operating Permit as stated in the table above.

c. Detecting Bypass (Section 64.4(a)(2)) – Per NSR special condition 14 I., when a bypass condition occurs, the system alarms shall be monitored to verify that the dampers have returned to a closed position as soon as practicable after each control system bypass.

2. Performance Criteria (Satisfies Section 64.4(a)(3)-(4))

a. Monitoring Frequency and Averaging:

The Part 70 Operating Permit requires the temperature to be monitored continuously and the temperature recorded continuously (i.e., at least every 15 minutes), and the rotary concentrator shall be equipped with a monitor that continuously measures the gas temperature in the desorption gas stream.

b. QA/QC Procedures:

The continuous temperature monitoring equipment shall be calibrated in accordance with the requirements of 40 CFR Part 60.394(b) to ensure continued validity of the recorded data.

F. Recordkeeping

Records relevant to the above requirements currently specified by the Title V operating permit will be maintained at the site. The Part 70 Operating Permit requires the facility to keep a file on all required monitoring data and support information for five years from the date of the monitoring sample, measurement, report or application.

The specific recordkeeping requirements for this proposed CAM plan are:

Continuously recording (i.e. at least every 15 minutes) the incinerator combustion temperature during coating operations.

G. Justification (Satisfies Section 64.4(b))

Temperature monitoring for the destruction of VOC by an incinerator is a widely accepted method of monitoring. Therefore, the requirement to monitor temperature and maintain appropriate records is a reasonable method of assuring VOC destruction efficiency for a CAM plan. Combined with the other factors noted above that are pertinent to compliance, this CAM plan provides a reasonable assurance of compliance with the applicable emission limitations.

The monitoring plan described above and currently part of the Operating Permit O1151 satisfies the requirements of CAM for Emission Units PROPSURF and PROTOPCOAT as defined in 40 CFR part 64 and summarized in paragraphs 2 and 3 of this Appendix 1. If you have any questions or need additional information, please contact Nick Ramos at (248) 881-6896 or Chris Boehle at (817) 652-2453.



Texas Commission on Environmental Quality
Federal Operating Permit Program
Individual Unit Summary for Revisions
Form OP-SUMR
Table 1

Date: 3/11/13	Regulated Entity No.: RN102505963	Permit No.: O1151
Company Name: General Motors LLS		Area Name: General Motors LLC Arlington Assembly

Unit/Process						Preconstruction Authorizations	
AI	Revision No.	ID No.	Applicable Form	Name/ Description	CAM	30 TAC Chapter 116/ 30 TAC Chapter 106	Title I
A	1	EPN 530	UA-15	Durr	Y	19156	
D	1	EPN 320	NA	Reeco Sr		19156	
A	1	EPN 321	UA-15	Reeco Jr	Y	19156	



Texas Commission on Environmental Quality
Federal Operating Permit Program
Individual Unit Summary for Revisions
Form OP-SUMR
Table 2

Date: 3/11/13	Regulated Entity No.: RN102505963	Permit No.: O1151
Company Name: General Motors LLS		Area Name: General Motors LLC Arlington Assembly

Revision No.	ID No.	Applicable Form	Group AI	Group ID No.	Plant AI	Plant ID No.



Texas Commission on Environmental Quality
Federal Operating Permit Program
Individual Unit Summary for Revisions
Form OP-SUMR
Table 3: Acid Rain and Clean Air Interstate Rule (CAIR)

Date: 3/11/13	Regulated Entity No.: RN102505963	Permit No.: O1151
Company Name: General Motors LLS	Area Name: General Motors LLC Arlington Assembly	Affected Source Plant Code:

Unit ID No.	Applicable Form	COR Unit ID No.	Acid Rain	CAIR	Status	COR



Emission Point/Stationary Vent/Distillation Operation Vent/Process Vent Attributes
Form OP-UA15 (Page 1)
Federal Operating Permit Program

Table 1a: Title 30 Texas Administrative Code Chapter 111 (30 TAC Chapter 111)
Subchapter A: Visible Emissions

Date: 3/11/2013	Permit No.: O1151	Regulated Entity No.: RN102505963
Area Name: General Motors LLC Arlington Assembly Plant		Customer Reference No.: CN603595646

Emission Point ID No.	SOP/GOP Index No.	Alternate Opacity Limitation	AOL ID No.	Vent Source	Opacity Monitoring System	Construction Date	Effluent Flow Rate
EPN 530	Primer Surfacer Booth, Clearcoat Booth & Clearcoat Observation	No		Other	None		470,000 acfm
EPN 321	Primer Surfacer Oven, Basecoat Heated Flash & Topcoat Oven	NO		Other	None		234,000 acfm